

Message

From: Ugai, Susan [susan.ugai@nebraska.gov]
Sent: 12/9/2020 4:59:22 PM
To: Green, Jamie [Green.Jamie@epa.gov]
CC: Weekley, Erin [weekley.erin@epa.gov]
Subject: Re: November 17, 2020, letter

That is all very helpful.

Thanks,
Susan

From: Green, Jamie <Green.Jamie@epa.gov>
Sent: Wednesday, December 9, 2020 10:47 AM
To: Ugai, Susan <susan.ugai@nebraska.gov>
Cc: Weekley, Erin <weekley.erin@epa.gov>
Subject: RE: November 17, 2020, letter

That appears to be it Susan. We have an e-mail from Tim where he provided the estimate. It doesn't speak to his conversation with the agronomist mentioned below – but that would be where this appears to have originated.

Is that helpful?

From: Ugai, Susan <susan.ugai@nebraska.gov>
Sent: Wednesday, December 9, 2020 10:33 AM
To: Creger, Tim <tim.creger@nebraska.gov>; Green, Jamie <Green.Jamie@epa.gov>; Weekley, Erin <weekley.erin@epa.gov>
Cc: Zimmerman, Tammy <tammy.zimmerman@nebraska.gov>
Subject: Re: November 17, 2020, letter

Thanks, Tim.
Susan

From: Creger, Tim <tim.creger@nebraska.gov>
Sent: Wednesday, December 9, 2020 10:25 AM
To: Green, Jamie <Green.Jamie@epa.gov>; Ugai, Susan <susan.ugai@nebraska.gov>; Weekley, Erin <weekley.erin@epa.gov>
Cc: Zimmerman, Tammy <tammy.zimmerman@nebraska.gov>
Subject: RE: November 17, 2020, letter

Jamie, Erin and Susan,

Without knowing which letter we are talking about, I really can't say for sure this rate of application was based on our communication from 2019 or not. I was told in April or May of 2019 by the company agronomist at Settje Ag (who had the contract with AltEn for handling the land application of the wetcake) that they were recommending a field application rate of 15-20 tons per acre, based on nutrient analysis of the target field soil

samples. Based on the our lab's report of the neonic concentrations of the wetcake sample collected in March of that year, and on consultation with EPA's Office of Pesticide Programs on what they knew was a maximum annual load per acre for those pesticides, I calculated the 20 ton per acre rate was many times more than the annual maximum allowed by EPA for agricultural crops, on an annualized basis. I did not make any recommendations for what NDA felt was an appropriate rate of application, because quite frankly, those rates would be so low as to make it economically unfeasible to apply.

Tim Creger

Pesticide/Fertilizer Program Manager

Nebraska Department of Agriculture

OFFICE 402-471-6882

From: Green, Jamie <Green.Jamie@epa.gov>

Sent: Wednesday, December 9, 2020 10:14 AM

To: Ugai, Susan <susan.ugai@nebraska.gov>; Weekley, Erin <weekley.erin@epa.gov>

Cc: Creger, Tim <tim.creger@nebraska.gov>

Subject: RE: November 17, 2020, letter

Hello Susan – That estimate was provided by NDA in April of 2019 as they were discussing the concentrations of one of the neonics identified in the wet cake and estimating what would be a labeled rate of application. I will do some digging today but am also including Tim Creger as he may be able to help more quickly.

Jamie

From: Ugai, Susan <susan.ugai@nebraska.gov>

Sent: Wednesday, December 9, 2020 9:30 AM

To: Green, Jamie <Green.Jamie@epa.gov>; Weekley, Erin <weekley.erin@epa.gov>

Subject: November 17, 2020, letter

Jamie

We have gotten an inquiry from AltEn's counsel regarding your November 17, 2020, letter. They were wondering where the 15-20 tons per acre application rate referred to in the last paragraph of page 2 came from. I assume it is from the materials NDEE sent you that came from AltEn's consultant, but I wanted to follow up and make sure that is correct.

Thanks,

Susan